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CASE NO. 7:24-CV-00317-DC-RCG MIDL:AND/ODESSA DIVISION

Exhibit A

November 18, 2024

Greg McCabe Chairman of the Board Next Bridge Hydrocarbons 6300 Ridglea Place, Suite 950 Fort Worth, TX 76116

Subject: Formal Request for Access to Books and Records Pursuant to Texas Business Organizations Code Section 21.218

Dear Mr. McCabe,

We, as a group of shareholders of Next Bridge Hydrocarbons ("NBH"), formally invoke our rights under **Section 21.218 of the Texas Business Organizations Code** to request access to specific books and records of NBH. This request is made in good faith for the legitimate purpose of investigating potential mismanagement, breaches of fiduciary duty, and actions that may have detrimentally affected shareholder value.

Requested Documents and Records

1. Board and Management Communications

- a. Board meeting minutes, resolutions, and presentations related to:
- i. The reverse merger between Torchlight Energy and Meta Materials.
- ii. The spin-out of oil and gas assets into NBH.
- b. Internal communications, including emails, exchanged between board members and executive officers including but not limited to yourself, John Brda, George Palikaras and Clifton DuBose regarding these transactions.

2. Financial Records

- a. Audited financial statements and annual reports for the preceding two fiscal years.
- b. Documentation regarding stock issuances and allocations associated with the spin-out of NBH.

3. Consulting and Employment Agreements

a. Contracts or consulting agreements involving yourself, John Brda, George Palikaras, Clifton DuBose, Rich Masterson, Clinton Plant or any and all other executives with Torchlight, Meta Materials, or NBH, including terms of compensation and delineation of responsibilities.

4. Lease and Asset Records

- a. Documentation and communications related to the loss of the University Lands lease, including:
 - 1. Specific reasons for any missed payment or non-compliance with lease terms.
 - 2. Internal correspondence or board discussions addressing risks to the lease.
 - 3. Proposals or remedial actions considered to prevent termination.
 - 4. Financial statements or cash flow records from the relevant period reflecting the company's ability (or inability) to meet payment obligations.
 - 5. Agreements and due diligence materials related to the acquisition of the Louisiana Heritage Play, including any disclosures of conflicts of interest.
 - 6. The exact locations, names, and production outputs of McCabe Petroleum Company's wells in Louisiana.

5. Shareholder Records

- a. Records identifying individuals or entities that approached NBH to acquire shares, including details of initial approaches and subsequent negotiations.
- b. Names and contact details of third parties expressing interest in purchasing NBH
- c. Summaries or descriptions of discussions or communications with third parties, including:
 - 1. Meeting dates and locations.
 - 2. Correspondence or exchanged documents (verbal or written).
 - 3. Participants in these discussions, including, but not limited to any and all board members or executives.
 - 4. Resolutions, agreements, or decisions made as a result of these discussions.
 - 5. Verification of share counts and allocation records, including documentation addressing potential naked short selling or unregistered shares.

6. SEC Filings and Withdrawals

- a. Correspondence and drafts associated with the withdrawn S-1 filing for Newco.
- b. Documents detailing changes in strategy or corporate governance tied to Newco's postponement or abandonment.

7. Non-Disclosure Agreements and Related By-Laws

a. We request copies of any and all Non-Disclosure Agreements, Non-Compete/Non-Disclosure Agreements, Secrecy Agreements, any similar agreements relevant to NBH operations or any reasonable facsimile thereof signed by you or any duly authorized officer or employee of NBH with any and all party or parties since the inception of NBH. b. We request copies of any and all Non-Disclosure Agreements, Non-Compete/Non-Disclosure Agreements, Secrecy Agreements, any similar agreements relevant to NBH operations or any reasonable facsimile thereof signed by you or any duly authorized officer or employee of any company, business, or partnership you owned in whole or in part, or were an officer thereof, with any and all party or parties, if said agreements as delineated in the foregoing carried over into NBH operations, support operations, social media campaigns, or other efforts.

C. We request you identify with particularity by name of the party and date of agreement any payment, compensation agreement, share distribution agreement, contract for shares or warrants in NBH or any other company, business, or investment for specific performance of work of any kind to individuals, entities, businesses, lobbyists, or social media influencer.

Detailed Explanation for Non-Compliance

If any requested documents are not provided, please include a comprehensive explanation for their unavailability or refusal to disclose.

Summary of Requested Items (Checklist)

- Board and management communications.
- Audited financial statements and stock issuance documentation.
- Consulting and employment agreements.
- Lease and assets records.
- Shareholder records and share count verification.
- Correspondence related to SEC filings and withdrawals.
- NDAs and by-laws.

Deadline for Compliance

In light of the urgency of this matter, I respectfully request the aforementioned documents be made available within three (3) business days of receipt of this correspondence. Should additional time be needed, please provide a detailed justification and a proposed timeline for compliance.

Consequences of Non-Compliance

Failure to comply may result in legal remedies, including filing a petition to compel disclosure in accordance with Texas law.

Point of Contact

For inquiries, please contact:

Danielle Spears

Phone: 480-476-1091

Email: paymmtlpnow@gmail.com

Please confirm receipt of this correspondence.

Sincerely,

Danielle Speak

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11/17/2024

Danielle Spears

Along with all undersigned shareholders.

53D41D27E1DD4C9... Contique Willcot

Dan Auxier

Jason Rolo

7025171B7C7047C. Jennifer Vetrano

Marcos Montiero

DocuSigned by:

Matthew Pease

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Matthew Pease